

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE PEOPLE OF THE STATE OF NEW YORK, by
BARBARA D. UNDERWOOD, Attorney General of
the State of New York,

Plaintiff,

v.

HUTTON VENTURES, LLC; PROGRESS
ADVOCATES, LLC; PROGRESS ADVOCATES
GROUP, LLC; STUDENT ADVOCATES, LLC;
STUDENT ADVOCATES GROUP, LLC; STUDENT
ADVOCATES TEAM, LLC; STUDENT LOAN
CARE, LLC; STUDENT LOAN SUPPORT LLC;
EQUITABLE ACCEPTANCE CORPORATION;
BRUCE BELLMARE; and STANLEY E.
FREUMUTH,

Defendants.

Civil Action No.: 18-cv-09812-AJN

NOTICE OF MOTION

TO: Melvin L. Goldberg, Esq.
Office of the New York State Attorney General
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New York, NY 10005
Attorneys for Plaintiff

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New York, NY 10005
*Attorneys for Defendant Progress Advocates, LLC, Student Loan Care, LLC, Bruce
Bellmare, Stanley E. Freimuth, and Debt Resolve, Inc.*

Adel James Chareq, Esq.
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Washington, DC 20006
Attorneys for Defendant Equitable Acceptance Corp.

PLEASE TAKE NOTICE that at a date and time to be determined by the Court, the undersigned, attorneys for Defendants Progress Advocates Group, LLC, Student Advocates Group, LLC, Student Advocates Team, LLC and Student Loan Support, LLC (collectively “Defendants”) will move before the United States District Court for the Southern District of New York, located at 100 State Street, Rochester, New York 14614, before Honorable Alison J. Nathan, United States District Judge, for an Order granting Defendants’ Motion to Dismiss; and

PLEASE TAKE FURTHER NOTICE that Defendants shall rely upon the enclosed Brief in Support of the Motion and the Certification of Peter G. Siachos, Esq., with exhibit, in support of the within application.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted with this motion.

Defendants respectfully requests oral argument if opposition is timely filed.

Dated: March 8, 2019
New York, New York

GORDON REES SCULLY MANSUKHANI LLP

*Attorneys for Defendants
Progress Advocates Group, LLC,
Student Advocates Group, LLC,
Student Advocates Team, LLC, and
Student Loan Support, LLC*

By: /s/ Peter G. Siachos

Peter G. Siachos, Esq.
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